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Jeremy R. Alberts, Esq. Nevada Bar No. 10797 *jalberts@wwhgd.com* Christopher T. Byrd, Esq. Nevada Bar No. 6582 cbyrd@wwhgd.com WEINBERG, WHEELER, HUDGINS, 4 GUNN & DIAL, LLC 6385 South Rainbow Blvd., Suite 400 Las Vegas, Nevada 89118 (702) 938-3838 Telephone: (702) 938-3864 Facsimile: 7 Attorneys for Defendant Universal Protection Service LLC 8 9 UNITED STATES DISTRICT COURT 10 DISTRICT OF NEVADA 11 Case No.: 2:19-cy-00652-JAD-DJA NEBYOU SOLOMON. 12 Plaintiff, 13 vs.STIPULATION AND [PROPOSED] ORDER TO CONTINUE DEADLINE FOR 14 LAS VEGAS METROPOLITAN **DEFENDANT UNIVERSAL** POLICE DEPARTMENT: 15 PROTECTION SERVICE, LLC TO JOSEPH LOMBARDO. RESPOND TO PLAINTIFF'S SECOND individually and his official 16 AMENDED COMPLAINT capacity as Sheriff; JOHN L. 17 PELLETIER, an individual; (FIRST REQUEST) RICHARD E. MAUPIN, an 18 individual; RYAN J. FRYMAN, an individual: JUAN D. 19 CONTRERAS, an individual; ALLEN J. PAVESE, an individual: 20 BRANDON M. MEADS, an 21 individual; FASHION SHOW MALL, LLC, a Nevada limited-22 liability company; UNIVERSAL PROTECTION SERVICE, LLC, a 23 Nevada limited-liability company; DOE SECURITY GUARDS I – III, 24 and individuals, 25 Defendants. 26

Pursuant to LR IA 6-1, Plaintiff NEBYOU SOLOMON ("Plaintiff") and
Defendant UNIVERSAL PROTECTION SERVICE, LLC ("Defendant UPS"), by
and through their respective counsel, hereby stipulate and request that this Court
extend the deadline for Defendant UPS to file its response to Plaintiff's Second
Amended Complaint (ECF No. 48), from March 23, 2020 to fourteen (14) days
after the Court's adjudication of Plaintiff's Motion for Leave to File Third
Amended Complaint (ECF No. 49).

This is the first stipulation for extension of time for Defendant UPS to file a response to Plaintiff's Second Amended Complaint. This request for an extension of time is not sought for any improper purpose or other purpose of delay.

WHEREFORE, the parties respectfully request that this Court extend the deadline to file Defendant UPS's response to Plaintiff's Second Amended Complaint, from March 23, 2020 to fourteen (14) days after the Court's adjudication of Plaintiff's Motion for Leave to File Third Amended Complaint (ECF No. 49).

IT IS SO STIPULATED.

Dated: March 19, 2020	Dated: <u>March 19, 2020</u>
McLetchie Law	Weinberg, Wheeler, Hudgins, Gunn & Dial, LLC
/s/ Alina M. Shell	/s/ Jeremy R. Alberts
Margaret A. McLetchie, Esq. Alina M. Shell, Esq. 701 E. Bridger Ave., Suite 520 Las Vegas, NV 89101 Attorneys for Plaintiff	Jeremy R. Alberts, Esq. Christopher T. Byrd, Esq. 6385 South Rainbow Blvd., Suite 400 Las Vegas, Nevada 89118 Attorneys for Defendant Universal Protection Service, LLC

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ORDER

IT IS SO ORDERED that the deadline for Defendant UPS to file its response to Plaintiff's Second Amended Complaint (ECF No. 48) be extended from March 23, 2020 to fourteen (14) days after the Court's adjudication of Plaintiff's Motion for Leave to File Third Amended Complaint (ECF No. 49).

DATED this 23rd day of March, 2020.

Daniel J. Albregis

United States Magistrate Judge

Respectfully submitted by:

WEINBERG, WHEELER, HUDGINS, GUNN & DIAL, LLC

/s/ Jeremy R. Alberts

Jeremy R. Alberts, Esq. Christopher T. Byrd, Esq. 6385 South Rainbow Blvd., Suite 400 Las Vegas, Nevada 89118 Attorneys for Defendant Universal Protection Service, LLC